IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

M. DIANE KOKEN, in her official capacity as Insurance Commissioner of the Commonwealth of Pennsylvania, as Liquidator of RELIANCE INSURANCE COMPANY (IN LIQUIDATION)

Plaintiff,

v.

GPC INTERNATIONAL, INC.

Defendant.

GPC INTERNATIONAL, INC.

Third-Party Plaintiff,

v.

ZURICH-AMERICAN INSURANCE COMPANY

Third-Party Defendant.

C.A. No. 05-223 (SLR)

NOTICE OF COMPLETION OF BRIEFING

Pursuant to D. Del. LR 7.1.2, briefing on Defendant and Third-Party Plaintiff GPC International, Inc.'s ("GPC") Motion for Leave to File an Amended Answer (the "Motion") is complete.

On April 13, 2006, GPC filed and served its Motion for Leave to File an Amended Answer and a Memorandum of Law in support thereof, with supporting declarations.

On May 1, 2006, Plaintiff, M. Diane Koken, as Liquidator of Reliance Insurance Company, filed and served her Memorandum of Law in Opposition to Defendants' Motion for Leave to File an Amended Answer together with a supporting declaration

On May 8, 2006, GPC filed and served its Reply Memorandum in Support of its Motion for Leave to File an Amended Answer.

All briefing related to the Motion has been completed. Pursuant to D. Del. LR. 7.1.4., GPC respectfully requests that oral argument be held on the Motion at the convenience of the Court.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

Of Counsel:

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Dated: May 8, 2006

By /s/ John M. Seaman

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